

COMMONWEALTH OF MASSACHUSETTS  
SUPERIOR COURT DEPARTMENT OF THE TRIAL COURT

HAMPDEN SS.

DOCKET NO: [REDACTED]

COMMONWEALTH  
V.  
[REDACTED]

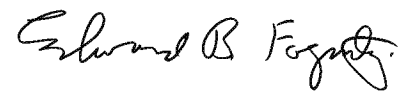
**MOTION FOR DISCOVERY OF POLICIES AND PROCEDURE OF THE STATE  
LABORATORY INSTITUTE AT AMHERST**

The defendant moves this Honorable Court to order the Commonwealth through its agents, the Department of Public Health at the State Laboratory Institute at Amherst to provide the Defendant with any written policies, regulations, guidelines or procedures in effect on March 9, 2011 to March 26, 2011 relating to the receipt, storage, testing and destruction/return of alleged narcotics in the above entitled case. The defendant's request includes, but is not limited to:

1. Policies and Procedures for the receipt, storage, testing and destruction/return of alleged narcotics.
2. Names of all chemists and any other employees who came into contact with the alleged narcotics specific to this case
3. Logs or records of receipt, storage, testing and destruction/return of the alleged narcotics specific to this case
4. Names of all supervisors or overseers of Assistant Analyst James Hanchett, the analyst in this case

As grounds therefore, the Defendant states that such information is essential to the defense of the Defendant and for the effective cross examination of Commonwealth witnesses.

THE DEFENDANT  
By His Attorney



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Date: September 6, 2012

CERTIFICATE OF SERVICE: I have caused a copy of the foregoing to be served upon the Hampden County District Attorney's office, via email. Edward B. Fogarty